

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARAT GOKHBERG, YURY GOKHBERG,
DAVID JAFFE, SUREKHA BASSI, AND MARC
FRANCHI,

PLAINTIFFS,

V.

THE PNC FINANCIAL SERVICES GROUP, INC.
AND PNC BANK, N.A.,

DEFENDANTS.

Case No.: 1:15-cv-06001-LTS

Document Filed Electronically

DECLARATION OF SARAH E. BOUCHARD

I, Sarah E. Bouchard, declare under penalty of perjury as follows:

1. I am a partner with the law firm of Morgan, Lewis & Bockius, LLP, counsel for Defendants The PNC Financial Services Group, Inc. and PNC Bank, National Association (collectively, "Defendants"). This declaration is based upon my personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of the Complaint filed in Bland v. PNC Bank, Case No. 1:15-cv-06001 (W.D. Pa. 2015).

3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Judith Haas.

4. According to the 2015 Federal Judicial Caseload Statistics, for the period ending March 31, 2015, there were over 18,500 civil cases pending in the Southern District of New York. See tables available at: <http://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2015/03/31-2>.

5. According to these same statistics, the Western District of Pennsylvania had a docket of only approximately 2,500 pending civil cases for the same time period. See id.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of September, 2015.

s/Sarah E. Bouchard
Sarah E. Bouchard